

In the Matter of

**Comments of the Women's Alliance
September 20, 2004**

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The Women's Alliance is a national organization of independent community-based members who provide professional attire, career skills training and related services to low-income women seeking employment. Our member organizations, in cities throughout the United States including Miami, Washington, Chicago, Atlanta and New York, have served over 130,000 women entering the workforce. In a given month, the Alliance members collectively serve 2,500 low income women.

The Alliance strongly supports the inclusion of wireless services including prepaid services such as those described in the Tracfone petition in the Lifeline program. Lack of phone service is serious barrier to employment for many of our clients and for many; wireless service is a better option for phone service than traditional wireline. Job seekers need a means for scheduling interviews, quickly returning calls from prospective employers; once employed low-income women often travel long distances to work and many have no access to telephones while on the job. Many work several jobs and are rarely home and rely on cell phones to keep in touch with their children, caregivers, schools and social services; others have additional responsibility for elderly family members and grandchildren. Many low-income women experience housing problems, move frequently, often stay for some period with friends and families, and do not have resources to have a landline repeatedly installed and removed. For the homeless, a wireless phone may be their only means of access to their “own” phone and the only way that those providing essential services such as healthcare, can locate them.

As a February 2004 survey by the Pew Project on Internet and American Life makes clear, low income people use cell phones in increasing numbers, and low income women, particularly those with children do so in higher numbers. While 54% of households with incomes under \$30,000 report cell phone use, 72% of women in single parent households use cell phones. In sum, cell phones have become a necessity for low income women, a tool for parenting and job opportunity.

Lifeline was created to ensure that all Americans would have access to telecommunications services. To fully achieve that goal in the Twenty First Century, low-income people should have access to competitive wireless services of all kinds, including the prepaid wireless services described in the Tracfone petition. Prepaid services in particular hold particular promise for low income people because there are no long term contracts that may be difficult to honor, no additional charges for late payment and very often, as set out in the Tracfone petition, provide additional services like voice mail and long distance at no additional charge.

We believe that expanding the carrier choices for low income people to all carriers that are willing to meet the service requirements—whether wireline and wireless, facilities based and resellers—is in the public interest. It would bring the same choices and consumer benefits to low-income people that are available to all other Americans and lower costs. It will also increase awareness of and participation of eligible Americans in the Lifeline Program.

Respectfully Submitted:

